



July 8, 2011

John McKenzie, Project Manager  
County of San Luis Obispo  
Department of Planning and Building  
976 Osos St., Room 200  
San Luis Obispo, CA 93408

Subject: Cold Canyon Landfill Expansion Conditional Use Permit (DRC 2005-00170)  
Recirculated Draft EIR

Dear Mr. McKenzie,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the Recirculated EIR for the Cold Canyon Landfill Expansion. The Recirculated EIR addresses hazards, noise and water.

*The following are APCD comments that are pertinent to this project.*

#### GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

#### SPECIFIC COMMENTS

##### **Page III-16 and V-177 Greenwaste handling**

As indicated in the Recirculated EIR, the applicant has voluntarily suspended operations at the compost facility in September (page V-177). Since that time, greenwaste has been

- 1) used as alternative daily cover for the working face of the landfill and,
- 2) transferred to another out of county facility.

Transporting greenwaste out of the county has the potential for significant air quality impacts due to additional heavy duty diesel truck trips and exposure of residence along the haul route to diesel particulate matter which is consider a toxic air contaminant. **The impacts from this hauling operation should be evaluated if there is a net increase in the number of haul trips from existing operations. Any further evaluation should include criteria pollutants, greenhouse gases and toxic air contaminates from the additional hauling.**

##### **Page V-193 Human Health Risk Assessment**

The health risk evaluation failed to address the risk from diesel particulate matter that would result from the diesel powered equipment that is used at the composting facility should these operation recommence on site. The sources of diesel particulate matter include but are not limited to, the tub grinder, haul trucks,

loader, windrow tuner, and trammel screen. The APCD recommends that diesel particulate matter emissions be evaluated in both the screening level and full health risk assessments. These emissions could be included in any baseline air monitoring evaluation program propose as part of HAZ/mm-8. There are several ways to mitigate diesel particulate emissions. **APCD recommends that these measures be implemented if composting operations are re-established.**

- Install a windbreak (i.e. evergreen trees) to reduce diesel particle matter from being transported off site.
- Install diesel particulate control devices on diesel equipment.

#### **V-199 Alternative Approach**

Modification to the existing facility may require a permit modification. Prior to implementing any changes to the compositing facility the operator should consult with the APCD. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

#### **Page 12, Appenxdix I, Assessment of Potential Impacts to Public and Workers Health**

The statement is made that there are "3 reasons why a Human Health Risk Assessment would be prepared for a site that potentially emits toxic air contaminants or bioaerosols:

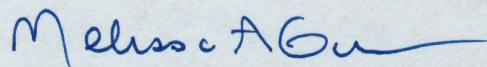
1. A facility is required to do so by law or regulation.
2. A heath risk is suspected and the presence and degree should be confirmed.
3. A health risk is not suspected and a risk assessment is conducted to confirm this lack of impact and provide assurances to the community."

The report goes on to state that " it was determined from a review of the San Luis Obispo County Air Quality Management District files that the preparation of a HRA is not required by law or regulation."

It should be noted that new development would be covered by the APCD CEQA Guidelines. Section 3.5.1 of these guidelines addresses facilities that have the potential to emit toxic air contaminants. This section would be applicable to new development at the landfill and composting facility.

If you have any questions regarding this matter please feel free to contact me at 802-781-4667.

Sincerely,



Melissa Guise  
Air Quality Specialist

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